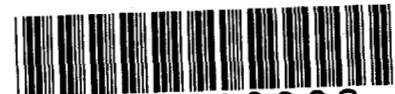


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BEFORE THE ARIZONA CORPORATION COMMISSION

Commissioners

SUSAN BITTER SMITH, Chairman
BOB STUMP
BOB BURNS
DOUG LITTLE
TOM FORESE

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2015 MAY 20 PM 3 01

Arizona Corporation Commission

DOCKETED

MAY 20 2015

IN THE MATTER OF THE APPLICATION)
OF RED ROCK UTILITIES, LLC, AN)
ARIZONA LIMITED LIABILITY)
COMPANY, FOR A DETERMINATION OF)
THE FAIR VALUE OF ITS UTILITY PLANT)
AND PROPERTY AND FOR INCREASES IN)
ITS WATER AND WASTEWATER RATES)
AND CHARGES FOR UTILITY SERVICE)
BASED THEREON.)

DOCKETED BY

[Signature]

DOCKET NO: WS-04245A-14-0295

APPLICANT'S CLOSING BRIEF

Pursuant to Administrative Law Judge Jane L. Rodda's oral directive during the April 22, 2015 evidentiary hearing in the above-captioned and above-docketed proceeding ("Instant Proceeding"),¹ Red Rock Utilities, LLC ("RRU" or "Red Rock") hereby submits its post-hearing Closing Brief.

I.

INTRODUCTION

As will be discussed below, the Instant Proceeding has several surrounding circumstances which are "unique." Among those is the fact that the issues upon which RRU and the Commission's Staff were in disagreement as of the end of filing of their respective prepared Direct Testimony and Exhibits have now been reduced or distilled down to a single issue. That issue is whether the Commission should approve RRU's request for an accounting order from the Commission which would allow RRU to defer

¹ Tr. 178, L. 18-25.

1 recording depreciation expense associated with utility plant with respect to which RRU has
2 proposed (and the Commission Staff has accepted) for purposes of the Instant Proceeding
3 certain capacity adjustments to recorded backbone water and wastewater plant which
4 removed the dollar amount of the plant which was the subject of such adjustments from
5 inclusion in rate base.

6 As RRU witness Thomas J. Bourassa observed in his prepared Rejoinder
7 Testimony, there are no remaining issues between RRU and the Commission's Staff, other
8 than the aforementioned accounting order issue:

9 **"Q5. PLEASE BRIEFLY SUMMARIZE THE COMPANY'S**
10 **REJOINDER POSITIONS FOR THE WATER AND WASTEWATER**
11 **DIVISIONS.**

12 A5. As I stated in my rebuttal testimony, the Company has adopted the
13 rate base, revenue and expense, and revenue requirement recommendations
14 of Staff's Plan A recommendations for both the water and wastewater
15 divisions for purposes of this case. The issue of Staff's proposed wastewater
16 rates not producing the revenue requirement also has been resolved. The
17 Staff proposed surrebuttal wastewater rates now match the Company's. The
18 rejoinder schedules attached hereto reflect the Company's rebuttal rate base,
19 revenue requirement, rates and rate design.

20 **Q6. ARE THERE ANY OUTSTANDING ISSUES?**

21 A6. Yes. Staff disagrees with the Company's request for an accounting
22 order to defer depreciation expense on certain plant costs the Company
23 proposed to remove from the ratemaking process. I will respond to the Staff
24 testimony later in this testimony."² and ³

25 In Section II below, RRU will discuss the reasons why Commission approval of the
26 accounting order requested by RRU would be appropriate in the "unique" circumstances of
27 the Instant Proceeding.

28 ² See Exhibit A-7 at page 2, lines 2-18.

³ See Exhibit A-7 at page 2, line 21 – page 5, line 4 for a summary of RRU's and the Commission Staff's agreement to
(i) revenue requirements, (ii) revenue increases, (iii) rate base and (iv) rate design. Further, with respect to rate design,
see Bourassa Rejoinder Schedule H-3, page 1.

II.

DISCUSSION

A. Nature of Requested Accounting Order.

As noted in Section I, the proposed accounting order would allow RRU to defer recording as depreciation expense until a final decision in RRU's next rate case depreciation associated with that portion of RRU's water and wastewater plant in service as of the end of the calendar 2013 test period, which is the subject of the aforementioned capacity adjustments. In that regard, during the April 22, 2015 evidentiary hearing, RRU witness Bourassa testified as to the principal features of the requested order:

"Q. Mr. Bourassa, in the event that Judge Rodda in preparing her recommended opinion and order in this case should decide to include a recommendation that the Commission adopt the type of accounting deferral order the company is requesting, what would be the important principal features or language describing that kind of accounting order that you would recommend be in her recommended opinion and order?

A. Well, I would limit it to only the capacity adjustments the company made on those backbone facilities, the water, wastewater treatment plant, the water treatment plant, and the storage, the tanks, or the tank in this case. Staff has made additional adjustments to, I think, transmission and other things to, as capacity, not used and useful. Like there may be a line that goes out into a subdivision and there is no customers.

We fully agree with Staff and have adopted their adjustments there. But it is only the backbone facilities that the accounting order should apply to and only those that were adjusted in this case. So that would be one of the main features that I would have in there.

And like all accounting orders, it is just a, it is a permission to defer, but it will be up to a future Commission to decide when and how and how much recovery of that deferred depreciation will be and when." [Tr. 79, l. 4 - Tr. 80, l. 5] [emphasis added]

In that regard, and as Mr. Bourassa elsewhere observed during his testimony, the Commission's granting of the requested order at this time does not assure future rate recovery of the resulting deferred depreciation expense. Rather, that would depend on whether the plant which is the subject of the current capacity adjustments was fully (or at

1 least more) utilized at that future point in time:

2 “Q. Is the nature of the accounting order that the company is requesting such
3 that it defers until a later rate case a decision by the Commission as to
4 whether or not to accord ratemaking recognition and recovery to the deferred
5 depreciation? ”

6 A. Yes. And let’s say that five years from now the company files another rate
7 case and there is still excess capacity, right, same amount of excess capacity.
8 I would doubt the Commission would then say, okay, start recovering the
9 deferred depreciation expense because you haven’t, you haven’t got more
10 customers and you still have that excess capacity issue.

11 So I am not, I am not a prognosticator. I am not looking out into the
12 future. But I don’t think the company would seek to recover that deferred
13 depreciation until there was such time there was sufficient customers. You
14 know, we have eliminated the excess capacity issue. If we haven’t eliminated
15 the excess capacity issue in its entirety, then the amount the company might
16 seek would only reflect the level of customers that actually exist at the time
17 of that next rate case plus a reasonable growth.

18 So, again, there is no guarantee of recovery. It is something that I
19 think is warranted because of the unusual circumstances in this case and the
20 approach that’s being taken and will help the company, ultimately help its
21 financial health in the future.” Tr. 74, l. 15 – Tr. 75, l. 16] [emphasis added]

22 **B. Amount of Water and Wastewater Plant Which is Subject of the Capacity**
23 **Adjustment.**

24 During the April 22, 2015 evidentiary hearing, Judge Rodda requested that the
25 parties brief the aforesaid issue, as follows:

26 “All right. So I started the day thinking, oh, we don’t need legal briefs on this
27 because there is one issue and I think I got it. But I think for clarity’s sake it
28 would help me to have one round of closing briefs that -- and here is what I,
besides your argument on pro and con on the deferred, the accounting order,
and, you know, to the extent you can cite to people’s testimony on the stand,
that’s helpful, I just want to be clear that I understand, I guess this relates also
to the deferral order, what is the excess plant both on the water and the
wastewater side that an accounting order would apply to. And I just need to
clarify what plant we are including.” [Tr. 175, l. 1-13] [emphasis added]

Thereafter, following an on-the-record discussion among Judge Rodda and counsel for Red
Rock and the Commission’s Staff, it was agreed that the plant to be identified and assigned

dollar values was as follows:

"The plant we are thinking about is the plant that was the subject of an excess capacity adjustment in the company's direct presentation. So we could identify that plant and we could assign dollar amounts to it. The argument as to whether or not the Commission should approve an accounting order, that's a related but it is a separate issue but within the scope of the same topic.

MS. MITCHELL: Yes.

ALJ RODDA: Okay. All right. And so --

MS. MITCHELL: What he said, I agree with that.

ALJ RODDA: I think you will -- whatever you guys, whatever you end up giving me I am sure will be helpful. And I appreciate your willingness to do so." [Tr. 178, l. 2-14] [emphasis added]

Against the above background and subsequent to the conclusion of the evidentiary hearing, Red Rock witness Bourassa prepared the following table in response to Judge Rodda's request:

Red Rock Utilities, LLC
Company proposed Excess Capacity Adjustments per Direct
Filing

Water Division

| <u>Acct No.</u> | <u>Description</u> | <u>Cost¹</u> | <u>A/D¹</u> | <u>Net</u> |
|-----------------|------------------------------|-------------------------|------------------------|------------|
| 320 | Water Treatment Equipment | \$ 309,456 | \$ (64,913) | \$ 244,543 |
| 330 | Dist. Reservoirs & Standpipe | 596,352 | (97,757) | 498,596 |
| Totals | | \$ 905,808 | \$ (162,670) | \$ 743,138 |

Wastewater Division

| <u>Acct No.</u> | <u>Description</u> | <u>Cost²</u> | <u>A/D²</u> | <u>Net</u> |
|-----------------|--------------------------------|-------------------------|------------------------|--------------|
| 380 | Treatment & Disposal Equipment | \$ 3,772,889 | \$ (1,376,000) | \$ 2,396,888 |

¹ See Water Division Direct Schedule B-2, page 3 and 4.

² See Wastewater Division Direct Schedule B-2, page 3 and 4.

As may be noted therefrom, the amount of capacity adjustments proposed by Red Rock for water plant and waste water plant are \$905,808 and \$3,772,889, respectively. Once

1 accumulated depreciation in the amounts of \$162,670 and \$1,376,000 are removed, the net
2 amounts of the capacity adjustments for Red Rock's depreciation expense for its water and
3 wastewater divisions are \$743,138 and \$2,396,888, respectively. It is those net amounts of
4 plant value (resulting from the capacity adjustments) which are the subject of Red Rock's
5 proposed accounting order.

6 **C. Circumstances Surrounding Red Rock's Proposed Plant Capacity**
7 **Adjustments.**

8 The water and wastewater plant capacity adjustments discussed above were occasioned by
9 the fact that the total capacity of water and wastewater plant then available was more than
10 the capacity that was necessary to serve Red Rock's customer count as of the end of the
11 calendar 2013 test period, although the utility plant of which that additional capacity is a
12 part was in fact "used and useful" during the test period. In that regard, the testimony of
13 Red Rock's General Manager (Mark Weinberg) during the April 22, 2015 evidentiary
14 hearing convincingly demonstrates that Red Rock was prudent at the time it made the
15 decisions in 2005 and 2006 as to the design and sizing of the backbone water and
16 wastewater plant which are the subject of the capacity adjustments that Red Rock has
17 proposed for purposes of the Instant Proceeding.⁴ What was not foreseeable by anyone in
18 2005 and 2006 was the 2008 financial crisis and the severe and prolonged subsequent
19 economic recession, and its drastic effect on the construction of new homes in Arizona.
20 This was particularly so in new "start up" residential communities such as the Villages at
21 Red Rock, which is the master-planned community in southern Pinal County that Red
22 Rock was formed to serve.⁵

23 In addition, compounding the aforementioned situation is the fact that new home
24 construction in Red Rock's Pinal County service area did not begin as soon after the
25 Commission's granting of the water and wastewater CC&Ns to Red Rock in late 2004, as
26

27 ⁴ See Tr. 23, l. 8 - Tr. 26, l. 19; Tr. 36, l. 8. - Tr. 37, l. 9; Tr. 56, l. 3 -Tr. 57, l. 5.

28 ⁵ See Tr. 31, l. 12 - Tr. 32, l.4; Tr. 33, l. 3-16.

1 was then anticipated, since there was a subsequent change in ownership of the Villages at
2 Red Rock project; and, the new owner (Putle Homes) redesigned the development plan,
3 which delayed the commencement of construction for more than a year. As a consequence,
4 Red Rock did not connect its first customer until August of 2007, approximately one (1)
5 year before the advent of the 2008 financial crisis.⁶ Despite that event, new home
6 construction and sales at the Villages at Red Rock were on the order of 250 per year during
7 2007 and 2008, which was consistent with the projected customer addition pattern at the
8 time the aforesaid backbone water and wastewater plant decisions were made in 2005 and
9 2006.⁷

10 But, beginning in 2009, the proverbial “bottom fell out” of the new home
11 construction industry in Red Rock’s Pinal County service area; and, annual new home sales
12 plummeted down to levels of approximately 30 to 40 per year through 2013.⁸

13 As a consequence, new home additions at the Villages at Red Rock have not grown
14 to the customer level at the end of the 2013 test period that was anticipated in 2005 and
15 2006. In recognition of that fact, and because of the additional “rate shock” consideration
16 discussed immediately below, Red Rock decided to propose the backbone water and
17 wastewater plant capacity adjustments here in question for solely purposes of this
18 proceeding.⁹ In that regard, Red Rock believes that it is somewhat (if not very) “unique” in
19 doing so. In fact, Commission Staff witness Dorothy Hains testified during the April 22,
20 2015 evidentiary hearing that

21 “. . . I never see [any] kind of company in my 17 years [of] serve the
22 Corporation Commission [where] they voluntarily [were] doing the plant
23 adjustments.” [Tr. 153, l. 20 – 24]

24 Further, Red Rock witness Bourassa testified that there was a question in his mind as to

25 ⁶ See Tr. 32, l. 5 – Tr. 33, l. 16; Tr. 48, l. 1-5.

26 ⁷ See Tr. 32, l. 2-4.

27 ⁸ See Tr. 26, l. 6-9; Tr. 33, l. 15-16; Tr. 48, l. 1- 24; also, see Exhibit S-2 at page 5 (Water Division), Table 3.

28 ⁹ See Tr. 68, l. 15- Tr. 70, l. 20.

1 whether the Commission's Staff on its own initiative would have made capacity
2 adjustments of the magnitude of those proposed by Red Rock.¹⁰

3
4 In summary, the background factors discussed above resulted in the backbone plant
5 capacity adjustments proposed by Red Rock, which in turn produce that utility plant and
6 related future depreciation expense which are the subject of Red Rock's proposed
7 accounting order.

8 **D. Illustration of Possible Future Rate Effect Resulting from Commission**
9 **Approval of Proposed Accounting Order.**

10 At page 5, l. 6 – page 9, l. 13 of his prepared Rejoinder Testimony,¹¹ Red Rock
11 witness Bourassa discussed at length the nature of Red Rock's proposed accounting order.
12 Therein he referred to an analysis he had prepared in response to the Commission Staff's
13 April 6, 2015 13th Set of Data Requests, which depicted projected per customer impact on
14 Red Rock's water and wastewater rates in future years (based upon the indicated
15 assumptions), in the event that the Commission should approve Red Rock's proposed
16 accounting order in the Instant Proceeding. As the following hearing transcript excerpt
17 indicates, Mr. Bourassa's analysis and projected rate impacts make several identified
18 assumptions:

19 **"Q12. HAS THE COMPANY GIVEN ANY THOUGHT TO HOW THE**
20 **REQUESTED DEFERRED DEPRECIATION EXPENSE MIGHT**
21 **IMPACT FUTURE RATES, IF THE COMPANY WAS ALLOWED**
22 **RECOVERY IN A FUTURE RATE CASE?**

23 A12. Yes. In response to Staff's 13th Set of Data Requests, dated April 6,
24 2015, the Company has prepared an analysis based on an assumption that the
25 next rate case would be in five years. This analysis is reflected at page 1 of
26 the attached Rejoinder Exhibit TJB-RJ-1. Based on the Company's analysis,
and using a 10 year recovery period, the projected per customer impact on
water rates is \$1.00 and the per customer impact on wastewater rates in

27 ¹⁰ See Tr.69, l. 25 – Tr. 70, l. 6; Tr. 89, l. 14-18.

28 ¹¹ See Exhibit RRU-7.

1 \$7.99. These would be equivalent to a 2.7 percent increase over the average
2 5/8x3/4 residential water bill under the proposed water rates in the instant
3 case and an 8.8 percent increase over the average 5/8x3/4 residential
4 wastewater bill under the proposed wastewater rates in the instant case.
5 Based on the Company's analysis, and using a 20 year recovery period (page
6 3 of the exhibit), the projected per customer impact on water rates is \$0.50
7 and the per customer impact on wastewater rates is \$3.99. These would be
8 equivalent to a 1.35 percent increase over the average 5/8x3/4 residential
9 water bill under the proposed water rates in the instant case and a 4.4 percent
10 increase over the average 5/8x3/4 residential wastewater bill under the
11 proposed wastewater rates in the instant case.

12 In that regard, these results assume a customer growth of 80 customers per
13 year, which may be conservative. If there are more customers in 5 years then
14 the impact will be less. Further, the analysis assumes that at that time all of
15 the plant costs are recognized in rate base in the next rate case. If the plant
16 still has "excess capacity" because the projected growth does not materialize,
17 the Company may not seek recovery of all of the deferred expense. Another
18 aspect of the future impact is that as the customer base continues to grow
19 beyond 5 years, in subsequent rate cases, the customer impact would decline.
20 And, the Commission retains its discretion as to what recovery the Company
21 will ultimately receive."¹²

22 Subsequently, during the April 22, 2015 evidentiary hearing, Mr. Bourassa further
23 discussed his analysis.¹³ Therein, he observed that his analysis looked at the results of the
24 requested depreciation expense "in isolation," and did not reflect those ratepayer savings in
25 the current case which would result from (i) the Plan "A" break-even approach, (ii) no
26 allowance for rate of return, and (iii) no allowance for income taxes. If these "savings"
27 were to be factored into his analysis, he believed the aggregate long-term impact on Red
28 Rock's customers would be even less.¹⁴

29 In addition, during his hearing testimony, Mr. Bourassa addressed (and Red Rock
30 believes effectively rebutted) an apparent Commission Staff concern that his analysis
31 understated the future rate impact of Commission approval of Red Rock's proposed
32 accounting order and the related deferral of future depreciation expense associated with

33 ¹² See Exhibit RRU-7 at page 5, line 7 – page 6, l. 18.

34 ¹³ Tr. 75, l. 17 – Tr. 80, l. 5.

1 Red Rock's proposed backbone plant capacity adjustments.¹⁵ In that regard, the net water
2 and wastewater plant capacity adjustments used in Mr. Bourassa's Rejoinder Testimony
3 analysis are the same as those set forth in the table appearing in Section II(B) above, which
4 is being provided in response to Judge Rodda's request.¹⁶

5 **E. Approval of Red Rock's Proposed Accounting Order Would Not Violate Any**
6 **Accounting Standards and is Within the Commission's Authority and**
7 **Discretion.**

8
9 *1. No Violation of Accounting Standards*

10 In the prepared Direct Testimony and Surrebuttal Testimony of Commission Staff
11 witness Crystal S. Brown, it appeared that the Commission Staff was taking the position
12 that Commission approval of Red Rock's proposed accounting order was precluded by
13 certain language from (i) the National Association of Regulatory Utility Commissioners
14 ("NARUC") "Uniform System of Accounts for Class "B" Water Utilities," and, (ii) the
15 Financial Accounting Standard Board's "Accounting Standard Codification No. 980," as
16 attached to Ms. Brown's prepared Surrebuttal Testimony.¹⁷ However, during the April 22,
17 2015 evidentiary hearing, it became readily apparent that (i) it is within the Commission's
18 authority and discretion to approve such an order, if it chooses to do so; and, on a previous
19 occasion, it has done so in a water utility rate case involving excess capacity and its own
20 "unique" circumstances. That case involved Goodman Water Company, and the
21 Commission's Decision No. 72897 was issued on February 21, 2012.

22 What Section 186(A)(7) of the NARUC Uniform System of Accounts does require,
23 as Mr. Bourassa readily acknowledged, is that it must appear "probable," at the time the
24

25 ¹⁴ Tr. 77, l. 18 – Tr.78, l. 9

26 ¹⁵ Tr. 125, l. 21 – Tr. 129, l. 19; and, as background, see Tr. 98, l. 14 – Tr. 102, l. 4.

27 ¹⁶ In that regard, see lines 8 and 10 under the "Cost" column heading at pages 1 and 2 of Exhibit TJB-RJ-1 to Mr.
Bourassa's prepared Rejoinder Testimony (Exhibit RRU-7).

28 ¹⁷ See Exhibit S-6, Attachment "A."

1 accounting order herein requested is approved, that at some future date at least some of the
2 depreciation expense proposed to be deferred will be recognized and provided for in future
3 Red Rock water and wastewater rates.¹⁸ In turn, whether or not the required probability
4 exists in a given case depends upon whether or not that case possesses “unique”
5 circumstances. That was the situation in the Goodman Water Company case which was the
6 subject of Decision No. 72897. Red Rock believes that the Instant Proceeding is also
7 characterized by “unique” circumstances which, while not identical to those present in the
8 Goodman Water Company case, are equally compelling in support of issuance of the
9 accounting order herein requested.

10
11 2. “Unique” Circumstances Warranting
12 Approval of Accounting Order

13 Red Rock believes there are several “unique” circumstances surrounding the Instant
14 Proceeding which support and warrant Commission approval of Red Rock’s proposed
15 accounting order. First, the backbone water and wastewater utility plant which is the
16 subject of Red Rock’s proposed capacity adjustments is not the result of imprudent sizing
17 and design decisions. Nor, is it the result of unrealistic customer growth projections at the
18 time those decisions were made. In fact, the customer growth experienced during the first
19 two (2) years of development at the Villages at Red Rock confirmed the reasonableness of
20 those projections. Rather, the precipitous fall-off in subsequent customer growth was the
21 result of the 2008 financial crisis and the “Great Recession” which immediately followed,
22 which no one could reasonably have foreseen in 2005 and 2006.¹⁹

23 Second, the depreciation expense proposed to be deferred is of a post-test period
24 nature, and relates to utility plant which Red Rock at its own initiative removed from rate
25 base as a mitigating measure for purposes of the Instant Proceeding, in order to mitigate
26

27 ¹⁸ See Tr.116, l. 6 – Tr. 117, l. 12; Tr. 131, l. 21 – Tr. 132, l. 16.

28 ¹⁹ See Tr. 48, l. 1-16.

1 “rate shock.” This is to be contrasted with the Goodman Water Company case where then
2 unneeded capacity was a contested issue.²⁰

3 Third, Red Rock is not seeking to defer any prior recorded depreciation expense, as
4 contrasted with the Goodman Water Company case. As Mr. Bourassa noted, Red Rock’s
5 proposal seeks deferral only of future depreciation expense, which is not included in any
6 manner in the revenue requirement in the Instant Proceeding;²¹ and, is designed to benefit
7 ratepayers in future rates as well.

8 Fourth, Red Rock is not proposing future rate recovery of carrying costs on the
9 deferred balances. In this instance, its proposal is consistent with the deferred accounting
10 order approved in Decision No. 72897.²²

11 Finally, for purposes of the Instant Proceeding, Red Rock has agreed to accept the
12 “break even” ratemaking approach utilized by the Commission’s Staff in the development
13 of the Commission Staff’s Plan “A.” This results in a significantly lower increase in
14 wastewater rates than would result under either Red Rock’s August 4, 2014 filing or the
15 Commission Staff’s Plan “B,” each of which uses the traditional rate of return ratemaking
16 methodology.

17 III.

18 CONCLUSION

19 For all of the reasons discussed in Sections I and II above, Red Rock believes that it
20 has convincingly demonstrated why Commission approval of Red Rock’s proposed
21 accounting order is both appropriate and warranted in the “unique” circumstances of the
22 Instant Proceeding. In that regard, Red Rock is relying on the circumstances of this case to
23 support its request. It is not relying on the fact of the Commission’s issuance of Decision
24 _____

25 ²⁰ See Decision No. 72897 at 20, lines 10-20. As Commission Staff witness Hains observed, this is the first time in
26 her 17 years at the Commission she has seen an applicant voluntarily propose a rate case adjustment of this nature.
27 See Tr. 153, l. 20-24. That observation comports with The Merriam-Webster Dictionary definition of “unique” as
28 “very unusual” or “notable”!

²¹ See Exhibit RRU-6 at page 8, l. 15 – 23; Tr. 91, l. 16-21.

²² See Exhibit RRU-6 at page 8, l. 24 – page 9, l. 1.

1 No. 72897 per se as precedent. However, Red Rock believes that (i) like the Goodman
2 Water Company case, the Instant Proceeding possess "unique" circumstances, and (ii) like
3 the Goodman Water Company case, "the totality of circumstances" also warrants approval
4 of the requested accounting order in this instance.

5
6 RESPECTFULLY SUBMITTED this 20th day of May, 2015.

7
8 By *Lawrence V. Robertson, Jr.*

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1 ORIGINAL and thirteen (13) copies of the
2 foregoing will be filed this
3 20th day of May, 2015, with:

4 Docket Control
5 Arizona Corporation Commission
6 1200 W. Washington St.
7 Phoenix, AZ 85007

8 A copy of the same served by e-mail
9 or first class mail that same date to:

10 Jane L. Rodda, Administrative Law Judge
11 Hearing Division
12 Arizona Corporation Commission
13 400 West Congress, Suite 218
14 Tucson, Arizona 85701

15 Robin R. Mitchell
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